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7

The Honorable Lonny R. Suko

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF WASHINGTON
10 AT SPOKANE

11 MAXIMILLIAN SALAZAR III,

12 Plaintiff,

13 v.

14 MONACO ENTERPRISES, INC.; and
15 GENE MONACO and MARTI
16 MONACO, husband and wife and the
17 marital community thereof; and ROGER
18 BARNO and NOELLE BARNO, husband
19 and wife and the marital community
thereof; and STRATEGIC ADVANTAGE,
20 LLC; and STEVE CESARE and JANE
DOE CESARE, husband and wife and the
marital community thereof,

21 Defendants.

NO. CV-12-186-LRS

DECLARATION OF RICHARD
BARNO

22 I, RICHARD BARNO, declare:

23 1. I am over the age of eighteen, competent to testify as to the matters set
24 forth herein, and I make this declaration based upon my own personal knowledge
25 and belief.
26

DECLARATION OF RICHARD BARNO: 1

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
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1 2. I am Roger Barno's brother. Roger is the Chief Operating Officer for
2 Monaco Enterprises, Inc. ("MEI"). I am not a defendant in this lawsuit and have
3 never been identified as a potential witness by MEI.

4 3. I have not had any involvement with the Plaintiff or any of the issues
5 in the lawsuit.

6 4. I have never had any work-related interaction with Plaintiff. In fact, I
7 have never met the Plaintiff, Max Salazar.

8 5 I am not part of MEI management and I am not an executive of MEI.
9 And, I only became an employee in January, 2013 (working as an independent
10 contractor on an as-needed basis starting in January 2012 through December,
11 2012), which was well after Mr. Salazar was terminated.

12 6. Even though I was not employed by MEI at the same time as Mr.
13 Salazar, I have never heard Plaintiff or anyone else at MEI ever complain about
14 any fraud, waste or abuse by the company. However, I am not involved with
15 bidding, contracting, or otherwise involved in travel quotes or requests, job cost
16 quotes, job completion, or the like.

17 7. In addition, I am not involved in human resources or employee
18 relations at MEI, and I had absolutely no involvement with Plaintiff's termination
19 from MEI. I have no personal knowledge regarding Plaintiff's termination from
20 MEI, and otherwise have absolutely no personal information regarding Plaintiff's
21 claims that he was retaliated against and unlawfully terminated by MEI. Again, I
22 have never met the Plaintiff, Max Salazar or spoken to him in any form or fashion.

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DECLARATION OF RICHARD BARNO: 2

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I declare under penalty of perjury of the laws of the State of Washington and the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

EXECUTED this 19th day of March, 2013, at Spokane, Washington.

Richard Barno
RICHARD BARNO

DECLARATION OF RICHARD BARNO: 3

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CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below,

1. I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **William Gilbert and all CM/ECF participants.**
2. I hereby certify that I have mailed by United States Postal Service the foregoing document to the following non-CM/ECF participant(s) at the address(es) listed below: **None**
3. I hereby certify that I have mailed by United States Postal Service the foregoing document to the following CM/ECF participant(s) at the address(es) listed below: **None**
4. I hereby certify that I have hand delivered the foregoing document to the following participants at the address(es) listed below: **None**

EXECUTED on March 19th, 2013, at Spokane, Washington.

/s/Daena Skobalski
Daena Skobalski
Legal Secretary to Michael D. Franklin

DECLARATION OF RICHARD BARNO: 4

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